

is required to scrutinize the Agreement for reasonableness and fairness. Plaintiffs and Defendants submit that the Agreement is, in all respects, a fair and reasonable resolution of bona fide disputes between Plaintiffs and Defendants under the FLSA, including disputes about the amount of hours worked and compensation due.

4. The Parties believe and submit that the terms and conditions of this confidential settlement are fair, reasonable, adequate, beneficial, and in the best interests of all parties. This proposed Agreement was reached following the exchange of information, data, and extensive negotiations, including a full-day mediation before a private mediator. Because of the various defenses asserted by Defendants and the possibility that Defendants may have successfully defeated or limited some or all of Plaintiffs' claims, including those claims related to willfulness, liquidated damages, and compensation for unpaid overtime, the parties believe that the Agreement represents a fair compromise of the claims. Moreover, given the risk that absent a settlement, this case could have proceeded to trial, a compromise of the claims prevents all parties from incurring the additional costs and delay associated with trial and appeal.

5. Wherefore, the parties respectfully request that the Court dismiss the case with prejudice and approve the Confidential Settlement.

Dated: December 27, 2016

Respectfully submitted,

By: /s/ Michael L. Sullivan

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was electronically filed with the Clerk for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court.

/s/ Jay Forester

J. Forester